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DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,

Plaintiff,

v.

OMEGLE.COM LLC,

Defendant.

Case No. 3:21-cv-01674-MO

**DECLARATION OF KIMBERLEE
GUNNING IN SUPPORT OF
DEFENDANT OMEGLE.COM LLC'S
MOTION TO STAY DISCOVERY**

I, Kimberlee Gunning, declare and state as follows:

1. I am an attorney at Focal PLLC and represent Defendant Omegle.com LLC ("Omegle") in this action. I am over 18 years of age. This Declaration is based upon personal knowledge unless otherwise stated, in which case I believe the information to be true.

2. On July 18, 2022, Plaintiff served 29 requests for production and 16 interrogatories on Omegle ("Discovery Requests").

3. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's First Request For The Production of Documents, dated July 18, 2022 and served on Omegle on that

DECLARATION OF KIMBERLEE GUNNING

date.

4. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's First Interrogatories to Defendant Omegle, dated July 18, 2022 and served on Omegle on that date.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 22nd day of July, 2022, at Seattle, Washington.

s/ Kimberlee Gunning
KIMBERLEE GUNNING